

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 07-412
v.	*	SECTION: N
BARBARA KNIGHTSHEAD	*	VIOLATION: 18 U.S.C . § 666(a)(1)(A)
	*	
	* * *	

FACTUAL BASIS

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant, BARBARA KNIGHTSHEAD. The Defendant has agreed to plead guilty as charged to the Indictment alleging she defrauded the Louisiana Department of Social Services, Office of Family Support of approximately \$9,564.00 in the form of Electronic Benefit Transfer cards in violation of 18 U.S.C. § 666 (a)(1)(A).

The Defendant, BARBARA KNIGHTSHEAD, was employed by the Louisiana Department of Social Services, Office of Family Support in Terrebonne Parish, within the Eastern District of Louisiana, as an examiner/analyst since 1990. Between the months of September and November 2005, the Defendant, BARBARA KNIGHTSHEAD, altered and

processed several fraudulent applications for benefits in the names of relatives and others which resulted in the fraudulent overpayment of Disaster Food Stamp Program (DFSP) benefits in the amount of \$9,564.00.

Records of the Louisiana Department of Social Services would establish that the defendant, BARBARA KNIGHTSHEAD, applied for disaster food stamp benefits on behalf of herself and her husband Henry Knightshead, using incorrect social security numbers. Further, these records, including defendant's bank records, would prove that the defendant, BARBARA KNIGHTSHEAD, under reported their household income and resources while overestimating their expenses on the application for benefits. As a result of the false and fraudulent statements contained in the Knightsheads' application, the amount of benefits over issued to the defendant and her husband was \$822.00.

Records of the Louisiana Department of Social Services would prove that the defendant was responsible for issuing benefits in the amount of \$1,497 under the name of "Charles White." The address used for the application for Charles White's benefits belonged to the defendant's nephew, Taurus Robinson. During the course of this investigation, United States Secret Service Special Agent Brent Hamel determined that Charles White was a fictitious person and \$1,497 in benefits fraudulently issued in the form of a Electronic Benefit Transfer card under the name of Charles White was received and used by the defendant's son.

Records of the Louisiana Department of Social Services would prove that the defendant was responsible for fraudulently issuing disaster food stamp benefits in the amount of \$1,776 under the name of Latrice Grace, the defendant's daughter-in-law. Latrice Grace would testify that she did not apply for the disaster food stamp program and she did not authorize anyone to

apply on her behalf.

Defendant, BARBARA KNIGHTSHEAD, was interviewed by Special Agent Hamel and stated that she applied for DFSP benefits for her son, Tedrick Knightshead. Defendant admitted using a false address on her son's application. Records would show that the amount of false and fraudulent benefits in the name of defendant's son was \$1,179.

Defendant BARBARA KNIGHTSHEAD admitted to altering her sister-in-law's application for disaster benefits. The defendant's sister-in-law would state that she applied for benefits for a two person household. Records would show that defendant's sister-in-law was certified for benefits for a six person household when in fact she was entitled to benefits for only a two person household. The amount of over issued benefits in the name of defendant's sister-in-law was \$1,311.

Records of the Louisiana Department of Social Services would show that defendant's mother-in-law, was certified for benefits for an eight person household when in fact she was entitled to benefits for a two person household. The amount of over issued benefits in the name of defendant's mother-in-law was \$1,872.

If called to testify, Taurus Robinson, the defendant's nephew, would state that he applied for disaster food stamp benefits for himself and one other household member. Taurus Robinson, however, received benefits for a three person household when he was only entitled to benefits for a two person household. The defendant, BARBARA KNIGHTSHEAD, admitted to adding the name "Tanisha" to Taurus Robinson's application. Taurus Robinson would further testify that he does not know anyone named "Tanisha". The amount of over issued benefits in the name of Taurus Robinson was \$357.00.

If called to testify, Herman Robinson, the defendant's nephew, would state that he applied for disaster benefits for himself and one other household member. Herman Robinson was certified for benefits for a three person household when he was only entitled to benefits for a two person household. The defendant admitted to altering the application for Herman Robinson. The amount of over issued benefits in the name of Herman Robinson was \$357.

Defendant admitted to having processed an application for her son, Martin Knightshead under the name of "Martin Knight" in violation of DSS policies and procedures. The amount of over issued benefits under the name of "Martin Knight" was \$393.

If called to testify, Bonnie Rehage, Crissie Ray and James Utley, would each state that they are supervisors at the Terrebonne Parish Office of Family Support and that they did not give the defendant, BARBARA KNIGHTSHEAD, instructions for processing applications for Hurricane Katrina assistance contrary to the policy and procedures of the Louisiana Department of Social Services, Office of Family Support. Specifically, each witness would testify that the defendant, BARBARA KNIGHTSHEAD, was prohibited from opening, reviewing, evaluating or certifying the requests for disaster assistance on family members' applications.

Certified records would be introduced to show that the Louisiana Department of Social Services Office of Family Support is a state program that receives in excess of \$10,000 per year in program funding from the United States government.

JULIA K. EVANS (D.C. BAR # 435461)
ASSISTANT UNITED STATES ATTORNEY

DEFENDANT BARBARA KNIGHTSHEAD

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